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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL LUCERO,

Plaintiff,

v.

ISABEL GUZMAN, ADMINISTRATOR  
and SMALL BUSINESS  
ADMINISTRATION,

Defendants.

Case No. 2:21-cv-00915-RFB-VCF

**Stipulation and Order to  
Extend Certain Discovery Deadlines  
(Fourth Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a 60-day extension of certain discovery deadlines as, and for the reasons, set forth below. This is the fourth request for an extension of the discovery schedule.

**DISCOVERY COMPLETED**

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures, and Plaintiff supplemented their disclosures.

Defendant served initial discovery requests, and Plaintiff responded to them.

On June 16, 2023, Defendant took Plaintiff's deposition.

On June 22, 2023, Plaintiff took the deposition of former SBA employee Denise Biaggi-Ayer.

**DISCOVERY REMAINING**

Discovery was completed on July 19, 2023.

**WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

This request concerns only the Dispositive Motions and Joint Pretrial Order deadlines. The hearing on Defendant's Motion to Dismiss is set on August 21, 2023 (ECF No. 59) which date coincides with the dispositive motions' deadline pursuant to the current discovery plan and scheduling order (ECF No. 54). The necessity to file such dispositive motions will depend on the outcome of the Defendant's motion to dismiss. For these reasons, the parties agree that they would like to have the dispositive motion deadline continued for additional 60 days from August 21, 2023.

**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

A 60-days extension of the remaining deadlines in the case would result in the following revised discovery schedule:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Dispositive Motions	08/21/2023	10/20/2023
Proposed Joint Pretrial Order	09/20/2023	11/20/2023 <sup>1</sup>

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 11th day of August 2023.

BLACK & WADHAMS

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/s/ Rusty Graf  
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/s/ Virginia T. Tomova  
VIRGINIA T. TOMOVA  
Assistant United States Attorney

**IT IS SO ORDERED:**



**UNITED STATES MAGISTRATE JUDGE**

8-15-2023

**DATED:** \_\_\_\_\_

<sup>1</sup> If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.